

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. _____

Hua Li,

Plaintiff,

v.

Shanghai Han Han Internet Technology Co., Ltd.,
Sanhe YaHengZhiYe Co., Ltd.,
Shenzhen Yehong Internet Technology Co., Ltd.,

Defendants.

/

COMPLAINT

Plaintiff Hua Li (“Hua Li” or “Plaintiff”), by and through undersigned counsel, for his complaint of design patent infringement against Shanghai Han Han Internet Technology Co., Ltd., Sanhe YaHengZhiYe Co., Ltd., and Shenzhen Yehong Internet Technology Co., Ltd. (collectively “Defendants”), and states as follows:

NATURE OF THE ACTION

1. This is a civil action arising out of Defendants’ patent infringement in violation of the Patent Law, 35 U.S.C. § 1, et seq., including 35 U.S.C. §§ 271, 281-285.
2. Defendants’ accused products “Adjustable Cervical Pillow” (“Accused Products”) infringe on Plaintiff’s U.S. Design Patent - D1,007,194 (the “D’194 Patent” or “Asserted Patent”) which embodies the design of a pillow.

JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over this case pursuant to the Federal Patent Act, 35 U.S.C. § 101 et seq., and 28 U.S.C. §§ 1331 and 1338.

4. Defendants are subject to personal jurisdiction in this district because they purposefully direct their sales of goods, utilizing Plaintiff's Patent, to Florida residents by operating stores through online Platforms that offer shipping within the United States, including Florida and this District.

5. Venue is proper in this Court pursuant to 28 U.S.C. § 1391.

THE PARTIES

6. Plaintiff is an individual resides in Guizhou Province, China. Plaintiff is the lawful owner of U.D. Design Patent No. D1,007,194. The D'194 patent was duly issued by the United States Patent and Trademark Office on December 12, 2023. A true and correct copy of the D'194 Patent is attached as **Exhibit 1**.

7. Upon information and belief, Defendants are entities incorporated in China. Defendants operate Amazon online stores through Seller Aliases listed below. A true and correct copy of Defendants' detailed Seller Information is attached as **Exhibit 2**.

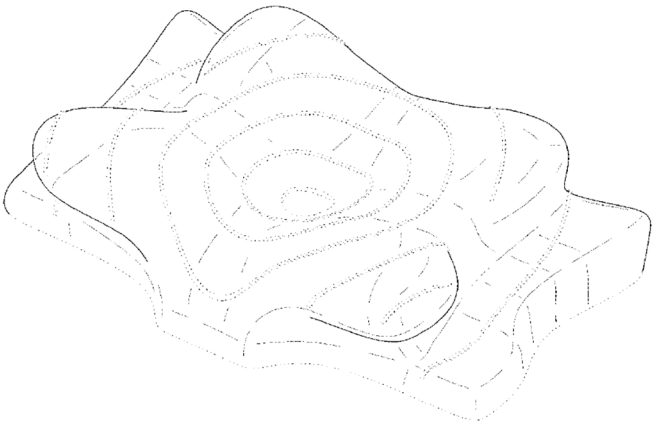

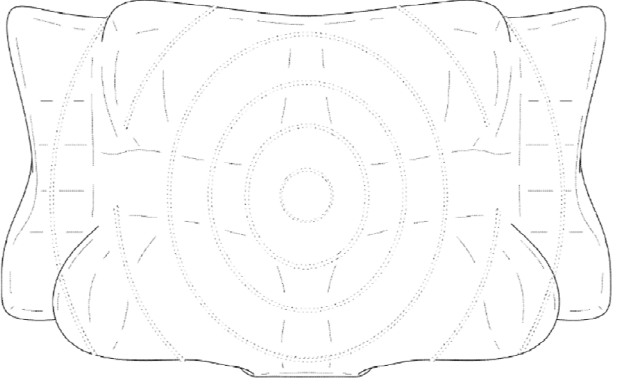

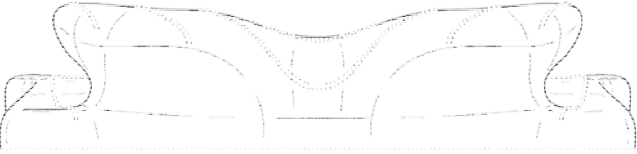

Defendants	Seller Aliases
Shanghai Han Han Internet Technology Co., Ltd. a.k.a. (SHANG HAI HAN HAN WANG LUO KE JI YOU XIAN GONG SI)	Hansleep US
Sanhe YaHengZhiYe Co., Ltd. a.k.a. (SanHeShi YaHengZhiYe YouXianGongSi)	Mophets
Shenzhen Yehong Internet Technology Co., Ltd. a.k.a. (ShenzhenYehongwangluokejiyouxiangongsi)	Yehong Store

8. Defendants are selling identical Accused Products under various Amazon listings, including but not limited to the products listed in the following page. A true and correct copy of product listings is also attached as **Exhibit 3**.

ASINs	ASIN URLs
B0D4QP9RKY	https://www.amazon.com/dp/B0D4QP9RKY
B0D4QPBQY1	https://www.amazon.com/dp/B0D4QPBQY1
B0DGLF37T5	https://www.amazon.com/dp/B0DGLF37T5
B0DGLJ3DL3	https://www.amazon.com/dp/B0DGLJ3DL3
B0DGLKXWZ8	https://www.amazon.com/dp/B0DGLKXWZ8
B0DGLHWVTJ	https://www.amazon.com/dp/B0DGLHWVTJ
B0DGLJJ7K8	https://www.amazon.com/dp/B0DGLJJ7K8
B0DGQBFQ9N	https://www.amazon.com/dp/B0DGQBFQ9N

Count I - Infringement of U.S. Patent D1,007,194

9. Plaintiff incorporates by reference the allegations set forth above in this Complaint as if fully set forth herein.

D'194 Patent	Accused Products
	
	
	

10. The side-by-side comparison in the previous page reveals that the Accused Products are substantially the same as the patented design of D'194 patent.

11. Based on the above comparison, an ordinary observer is likely to find that the Accused Products infringe upon the design embodied in the '194 Patent.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

- 1) That Defendants and all of its subsidiaries, affiliates, officers, agents, servants, employees, attorneys, and their heirs, successors and assigns, and all persons acting in concert or participation with it and each of them, be immediately enjoined and restrained, preliminarily and permanently, without bond, from
 - a. manufacturing, distributing, selling or offering to sell in the United States or importing into the United States products infringing the claims of the Asserted Patent; and deliver to Plaintiff all products that infringe the Asserted Patent;
 - b. aiding, abetting, contributing to, or otherwise assisting anyone in infringing upon the Asserted Patent;
 - c. effecting assignments or transfers, forming new entities or associations or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in Subparagraphs (a) and (b).
- 2) Entry of an Order that, upon Plaintiff's request, those with notice of the injunction, including, without limitation, any online marketplace platforms such as Amazon (collectively, the "Third Party Provider") shall disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of goods that infringe Patent claimed in the Asserted Patent;

- 3) A judgment that Defendants has infringed each of the Asserted Patent;
- 4) An award of damages for infringement of the Asserted Patent together with prejudgment interest and costs, said damages to be trebled by reason of the intentional and willful nature of Defendants' infringement, as provided by 35 U.S.C. § 284;
- 5) Costs of suit;
- 6) Finding of the case to be exceptional under 35 U.S.C. § 285, and an award of Plaintiff's reasonable attorneys' fees;
- 7) That any monetary award includes pre- and post-judgment interest at the highest rate allowed by law; and
- 8) Such other relief as the Court may deem just and proper.

Jury Trial Demand

Plaintiff hereby demands a jury trial on all issues so triable.

October 16, 2024,

Respectfully submitted,

/s/ Andrew J. Palmer

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